

**THE STATE OF NEW HAMPSHIRE
INDICTMENT**

ROCKINGHAM, SS.

APRIL TERM, 2007

At the Superior Court, holden at Brentwood, within and for the County of Rockingham, on the 26th day of April in the year of our Lord two thousand and seven,

THE GRAND JURORS FOR THE STATE OF NEW HAMPSHIRE, upon oath, present that:

**JOHN A. BROOKS
(D.O.B. 07/21/52)**

of Las Vegas, Nevada, on or between the 1st day of April and 27th day of June, 2005, at Deerfield, New Hampshire in the County of Rockingham, with force and arms, did commit the crime of

**Conspiracy to Commit Capital Murder
(RSA 629:3; 630:1, I(c))**

in that with the purpose that the crime of capital murder be committed he agreed with Joseph Vrooman, and/or Robin Knight, and/or Michael Benton, and/or Jesse Brooks to cause the death of Jack Reid, Sr. And one or more of the co-conspirators committed one or more of the following overt acts in furtherance of the conspiracy:

1. John Brooks asked Joseph Vrooman to help him kill Jack Reid, Sr. in exchange for an amount of money; and/or
2. Joseph Vrooman obtained a stun gun, handcuffs, and/or spray; and/or
3. Jesse Brooks contacted Michael Benton; and/or
4. John Brooks sent a package via Federal Express to 145 North Road in Deerfield, New Hampshire; and/or

07-S-1031

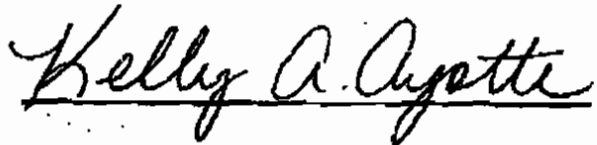
5. John Brooks traveled from Nevada to New Hampshire on or about June 17, 2005; and/or
6. Joseph Vrooman traveled from Nevada to New Hampshire on or about June 27, 2005; and/or
7. John Brooks asked Michael Benton to help him kill Jack Reid, Sr. in exchange for an amount of money; and/or
8. John Brooks asked Michael Benton to purchase a cellular telephone; and/or
9. Michael Benton purchased a cellular telephone; and/or
10. Michael Benton activated a cellular telephone under the name Charlie Was; and/or
11. John Brooks asked Robin Knight to help him kill Jack Reid, Sr.; and/or
12. John Brooks asked Robin Knight to call Jack Reid, Sr. on a cellular telephone; and/or
13. Robin Knight called Jack Reid, Sr. on a cellular telephone; and/or
14. John Brooks and/or Joseph Vrooman purchased "zip ties;" and/or
15. John Brooks traveled to Manchester, New Hampshire in order to pick up Michael Benton; and/or
16. John Brooks traveled to 145 North Road in Deerfield, New Hampshire on June 27, 2005; and/or
17. Joseph Vrooman traveled to 145 North Road in Deerfield, New Hampshire on June 27, 2005; and/or
18. Robin Knight traveled to 145 North Road in Deerfield, New Hampshire on June 27, 2005; and/or
19. Michael Benton traveled to 145 North Road in Deerfield, New Hampshire on June 27, 2005; and or
20. John Brooks brought a handgun with him to 145 North Road in Deerfield on June 27, 2005; and/or
21. Robin Knight led Jack Reid, Sr. into a barn attached to the residence at 145 North Road, Deerfield, New Hampshire.

**THE STATE OF NEW HAMPSHIRE
INDICTMENT**

ROCKINGHAM, SS.

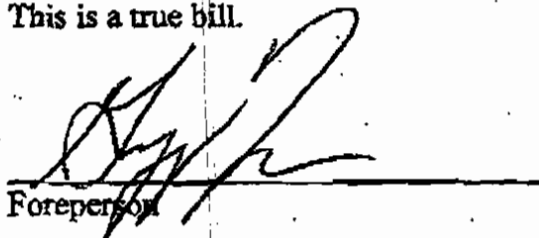
APRIL TERM, 2007

John A. Brooks' conduct was contrary to the form of the statute, in such case made and provided, and against the peace and dignity of the State.



Kelly A. Ayotte
New Hampshire Attorney General

This is a true bill.


Foreperson

DATED: April 26, 2007

Defendant's Name:

John A. Brooks

DOB:

07/21/1952

Address:

2670 Harbor Hills Lane, Las Vegas, NV 89117

RSA:

RSA 629:3: 630:1. I(c)

Dist/Mun Ct:

Auburn District Court, Docket Nos. 06-CR-3316, 17